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February 19, 2003

Agricultural Marketing Service
USDA STOP 0249
1400 Independence Ave. SW
Washington, DC 20250-0249

To Whom It May Concern:

My name is Sara Rose and I am a veterinarian in a private mixed animal practice in southwest Minnesota. Our practice services swine producers of all size and system type.

I am concerned about the proposed Country of Origin Labeling requirements for several reasons:

1. Swine producers have had several tough economic years and it has been difficult for them to be profitable. The added cost of third party verification and costs passed down from packers for product separation and labeling may just be enough to push producers over the edge and out of business.
2. I seriously question how much country of origin labeling on meat products will affect consumer decisions. I believe that consumers look for a product that tastes good, is convenient, safe, and a good economic value. If all those factors are equal, then they may choose a US produced product over a foreign product, but will the consumer pay an extra premium for US produced product? Every consumer has been affected by the current economic climate and extra money to purchase US grown products may not be an option.
3. We work with many producers who purchase 14-17 day old isowean pigs from Canada and finish these pigs in the US. Ninety plus percent of the inputs that go into these animals are US origin. Many times these animals are purchased from Canada because of health reasons. These pigs should not be penalized at the packer because they spent less than 3 weeks of their life in Canada. If COOL goes into affect, I strongly suggest that there is a time limit that animals need to be fed in the US before a labeling requirement is enabled. This may need to be species defined; such as if the last 90 days of a pig's life were spent in the US then they would be considered US origin. Please don't penalize producers who have found high health pigs in Canada and finish them in the US.

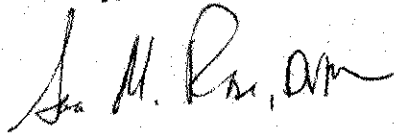
In summary, I have several reservations as to whether COOL will have any beneficial affects for the livestock producer. I feel that it will be an added cost for them in tracking and packer fees and the consumer will not see added value in the product. If COOL is enacted please consider

W.R. Freese, M.S., D.V.M. C.W. Pfeifer, D.V.M. K.A. Wilson, D.V.M. S.D. Dudley, D.V.M.
R.J. Leiting, D.V.M. C.L. Mews, D.V.M. S.M. Rose, D.V.M. C.S. Reng, D.V.M.

time limits on feeding periods in the US as not to penalize producers who purchase young animals and finish them using US inputs.

Thank you for your attention.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sara M. Rose, DVM".

Sara M. Rose, DVM
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